

# COHEN GREEN

April 15, 2023

Honorable Valerie Figueredo, U.S.M.J.  
United States District Court, Southern District of New York  
Daniel Patrick Moynihan Courthouse, 500 Pearl Street  
New York, New York 10007

By Electronic Filing.

**Re: Rodriguez et al v. City of New York, et. al., 21-CV-10815 (PKC)(VF)**

Dear Judge Figueredo:

I am co-counsel for Plaintiffs in the above-captioned matter. I write in regards to the settlement conference scheduled for May 18, 2023 (Dkt. 40). I respectfully request that Plaintiff Alexander Niculescu's appearance at the conference be waived and that he be allowed to be available by telephone. Plaintiff Niculescu is a medical doctor, who is scheduled to work until 8 p.m. on May 18, 2023 at Montefiore Medical Center in the Bronx. Dr. Niculescu has informed me that he will be able to request an assignment on May 18 where he can answer and use his telephone, but due to a shortage of physicians it will be very hard to get his shift covered.

Thank you for your attention to this matter.

Respectfully submitted,

/s/

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Elena L. Cohen

*Honorific/Pronouns: Ms., she/ her/ hers*

**COHEN&GREEN P.L.L.C.**

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cc:

All relevant parties by electronic filing.